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17 *Ultimate Fighting Championship and UFC*

18
19 UNITED STATES DISTRICT COURT
20 DISTRICT OF NEVADA

21 Cung Le, Nathan Quarry, Jon Fitch, Brandon
22 Vera, Luis Javier Vazquez, and Kyle
23 Kingsbury, on behalf of themselves and all
24 others similarly situated,

25 Plaintiffs,

26 v.

27 Zuffa, LLC (d/b/a Ultimate Fighting
28 Championship and UFC),

Defendant.

No.: 2:15-cv-01045-RFB-BNW

**REQUEST PURSUANT TO LR IA 6-1 FOR
ORDER SHORTENING TIME TO RULE ON
DEFENDANTS' MOTION TO
CONSOLIDATE BRIEFING AND AMEND
SCHEDULING ORDER**

Kajan Johnson and Clarence Dollaway, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC (d/b/a Ultimate Fighting
Championship and UFC), and Endeavor
Group Holdings, Inc.,

Defendants.

No.: 2:21-cv-01189-RFB-BNW

LR IA 6-1 permits parties to seek an order shortening time where good cause exists. The Rule requires counsel or a party to submit a declaration detailing the circumstances that constitute good cause. *Id.* The rule further requires the requesting party to notify the courtroom administrator for the assigned judge that a request for order shortening time has been filed. *Id.* Counsel for Defendants Zuffa, LLC (“Zuffa”) and Endeavor Group Holdings, Inc. (collectively, “Defendants”)¹ hereby submits the following declaration in support of Defendants’ request for an order shortening the time to rule on Defendants’ Motion to Consolidate Briefing and Amend Scheduling Order.

DECLARATION OF J. COLBY WILLIAMS

I, J. Colby Williams, declare as follows:

1. I am an attorney admitted to practice before the courts of Nevada, State Bar Number 5549. I am a partner in the law firm Campbell & Williams, which is Nevada counsel for Defendants in the above-captioned cases.

2. I make this declaration in support of Defendants' Request Pursuant to LR IA 6-1 for Order Shortening Time to Rule on Defendants' Motion to Consolidate Briefing and Amend Scheduling Order. Based on my review of the files and records in this case, I have personal knowledge of the contents of this declaration and could testify thereto.

3. On November 1, 2023, the court issued an Order (ECF No. 894) setting a hearing on November 17, 2023, for Defendant Zuffa, LLC’s Motion to Reopen Discovery (ECF No. 884). The new November 17 hearing date preceded the previously ordered dates for Plaintiffs’ opposition (November 21) and Defendant’s reply in support of the Motion to Reopen Discovery (December 19). ECF Nos. 846, 847.

3. To address this development, on November 6, 2023, Defendants filed a motion proposing a revised briefing schedule for their Motion to Reopen Discovery and Defendants' related Motion Regarding *Johnson* Evidence (ECF No. 885) so that (1) Plaintiffs and Defendants

¹ This Request is being filed simultaneously in both of the above-captioned cases. Endeavor Group Holdings, Inc. is a Defendant only in *Johnson, et al. v. Zuffa, LLC, et al.*, No. 21-cv-1189.

1 would have a reasonable opportunity to respond to the other side's arguments; and (2) briefing
2 would be completed adequately before the Court-ordered November 17, 2023 hearing. *Le*, ECF
3 No. 896; *Johnson*, ECF No. 92.

4 4. Plaintiffs filed an opposition the same day proposing one schedule that would deny
5 Defendants any reply to the larger motion, and a second proposal that would give Defendants only
6 two days to respond to a 30-page omnibus brief. *Le*, ECF No. 897; *Johnson*, ECF No. 93.

7 5. Defendants filed a reply later on November 6 addressing Plaintiffs' opposition to
8 the motion. *Le*, ECF No. 898; *Johnson*, ECF No. 94.

9 6. Defendants' motion is now fully briefed and ready for decision.

10 7. The purpose of this Declaration is not to repeat the parties' respective substantive
11 arguments on the appropriate briefing schedule but, instead, to request that the Court rule on
12 Defendants' Motion as soon as practicable. Given that the parties' papers propose competing
13 briefing schedules on two important motions scheduled to be heard just eleven days from now on
14 November 17, the undersigned respectfully submits that all parties will benefit from a prompt
15 ruling on Defendants' motion.

16 8. All parties have a substantial amount of work to complete prior to the November
17 hearing date to ensure the issues are fully and fairly presented to the Court. Knowing the
18 applicable schedule and corresponding deadlines with as much notice as possible will enable the
19 parties to complete their respective tasks timely, efficiently, and in a manner designed to make the
20 Court's life easier at the November 17 hearing.

21 9. For the reasons set forth herein, the undersigned submits that good cause exists to
22 enter an order shortening the time to rule on Defendants' Motion to Consolidate Briefing and
23 Amend Scheduling Order. Pursuant to LR IA 6-1, the undersigned will notify His Honor's
24 courtroom administrator that this request has been submitted.

1 I declare under penalty of perjury of the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 6th day of November 2023 in Las Vegas, Nevada.
4

5 /s/ J. Colby Williams
6 J. Colby Williams, Bar No. 5549

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **Request Pursuant to LR IA 6-1 for Order Shortening Time to Rule on Defendants' Motion to Consolidate Briefing and Amend Scheduling Order** was served on November 6, 2023, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

Dated: November 6, 2023

/s/ J. Colby Williams

J. Colby Williams